

## PART 4 - FEDERAL FACILITY DQOs

### *FF.1 Federal Facility Agreement (FFA)/ Interagency Agreements (IAG)*

#### Section 1 - Program Activity Information

1.1 Program Activity: Federal Facility Agreement (FFA)/Interagency Agreements (IAG)

1.2 Program Activity Category: GPRA Annual Performance Goal

1.3 Program Area: Federal Facility

1.4 EPA Sponsor:

Subject Matter Expert	Subject Area	Phone #
Josh Barber	Federal Facility	(703) 603-0265

#### Section 2 - Problem/Decision Objective

2.1 Problem: FFAs/IAGs are legal agreements between Federal agencies responsible for cleanup, EPA, and the States. A State may elect not to participate in FFA/IAG negotiations. FFA/IAGs set forth detailed requirements for performance of site response activities as well as appropriate enforcement responses to non-compliance with the FFA/IAG. The FFA/IAG requirement is set forth in Section 120(e) of CERCLA.

2.2 Stakeholder(s): Headquarters FFRRO and FFEO , Regional IMCs, FF RPMs, Congress and the Public.

2.3 Decision-maker(s): EPA Regions are responsible for data entry into WasteLAN for FFA/IAG actions and dates. Users with roles that allow data entry on the project schedule are permitted to enter the required data for these decisions.

2.4 Decision: Track and report the number of FFA/IAGs started and the number of FFA/IAGs completed. FFA/IAG starts will be tracked as IAG Negotiations (Action Name = IAG Negotiation) actual start date. The actual start for an IAG Negotiation is the date that a notice letter is sent by EPA to the Federal facility. FFA/IAG completions will be tracked as the completion (Actual Complete) of the FFA/IAG (Action Name = Federal Interagency Agreement). The actual completion date is the latter of a) the date that the Federal agency, EPA and/or State sign the IAG, or b) the date the Letter of Intent to sign and IAG is signed by all parties. FFA/IAGs that are elevated to HQ for dispute resolution during the reporting time period do not receive credit for completion. For these FFA/IAGs, users will record the date elevated as the actual completion date of the subaction "IAG Dispute Admin Referral" and not as the FFA/IAG completion date.

### Section 3 - Information Needs

Name	Source	System	Table/Column
Site ID		WasteLAN	Site/site_id
IAG Negotiation document	notice letter sent by EPA to the Federal facility	WasteLAN	Action/rat_code, act_code_id where rat_code = 'IN'
IAG Negotiation Start Date	notice letter sent by EPA to the Federal facility	WasteLAN	Action.act_curr_pln_strt_fyq within user selected range for planning OR action.act_actl_strt_date is NOT null for accomplishment
Interagency Agreement (IAG)	IAG	WasteLAN	uaction/rat_code, act_code_id where rat_code = 'FI'
IAG completion date	IAG signature date or signed Letter of Intent by all parties	WasteLAN	action.act_curr_pln_cmpltn_fyq within user selected range for planning OR action.act_actl_cmpltn_date is NOT null for accomplishment
Federal Facility		WasteLAN	site.rfed_fcilty_code = 'Y'
Lead Code		WasteLAN	action.ralt_code = 'FE'

### Section 4 - Scope/Universe

This GPRA measure counts only Federal facility sites with NPL status of “Currently on the Final NPL”, “Proposed to the Final NPL”, “Part of an NPL site” or “Deleted from the Final NPL” that have either an IAG Negotiation action started during the reporting period, or a Federal Interagency Agreement action completed during the reporting period. The number of FFA/IAG starts and the number of FFA/IAG completions are reported separately.

### Section 5 - Data Quality Requirements

5.1 Completeness: In order to receive credit for the GPRA goal, either an IAG Negotiation action must be on the project schedule with an actual start date within the reporting period, or a Federal Interagency Agreement action must be on the project schedule with an actual completion date within the reporting period. A site need not have both actions entered on the project schedule.

- The DQO applies to all Federal Facilities Sites in CERCLIS.

5.2 Accuracy: The actual start for an IAG Negotiation action is the date that a notice letter is sent by EPA to the Federal facility. The actual completion for a Federal Interagency Agreement action is the latter of a) the date that the Federal agency, EPA and/or State sign the IAG, or b) the date the Letter of Intent to sign and IAG is signed by all parties. There is objective evidence (documentation that a third party can examine and arrive at the same conclusion) to support the accomplishment of this measure.

- Most Accurate - Data reported in official decision source document

- 5.3 Timeliness: This measure is based on the IAG Negotiation and Federal Interagency Agreement actions, and therefore, timeliness is dependent on that required for those actions. The HQ data sponsors review the data for this DQO semi-annually and contact the appropriate regional staff to address any outstanding issues. Although the GPRA measure is counted at fiscal year end, the action data should be entered in a timely basis (within 5 working days of actual start/completion/signature of decision documentation).
- 5.4 Consistency: There are clear national definitions and guidance. Guidance on this measure is available in the Superfund Program Implementation Manual.
- Most Consistent - National Guidance and definitions have been distributed

## **Section 6 - Information Collection and Reporting**

- 6.1 Source for the information: Federal Interagency Agreement (signed agreement or Letter of Intent), or IAG Negotiation documentation (such as Letter sent by EPA to Federal facility)
- 6.2 User interface: User enters the FFA/IAG actions (IAG Negotiation or Federal Interagency Agreement) and dates (actual start or actual completion, respectively) into the Enforcement project schedule.
- 6.3 System transfers: This information is snapshot from region to Headquarters.
- 6.4 Internal outputs: SCAP-14 Federal Facility; Federal Facility Accomplishment Report
- 6.5 Audit Reports: Federal Facility Audit Report
- 6.6 External outputs: Reported annually to Congress
- 6.7 Guidance documentation:
- ▶ Superfund Program Implementation Manual (SPIM) – OSWER Directive 9200.3-14-1G-Q